

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LULA WILLIAMS, GLORIA TURNAGE,
GEORGE HENGLE, DOWIN COFFY, and
FELIX GILLISON, JR., *on behalf of themselves
and all individuals similarly situated, :*

Civil Case No. 3:17-cv-00461-REP

Plaintiffs,

Hon. Robert E. Payne

v.

BIG PICTURE LOANS, LLC; MATT MARTORELLO;
ASCENSION TECHNOLOGIES, INC.;
DANIEL GRAVEL; JAMES WILLIAMS, JR.;
GERTRUDE MCGESHICK; SUSAN MCGESHICK;
and GIIWEGHIZHIGOOKWAY MARTIN,

Defendants.

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AFFIDAVIT OF SUSAN MCGESHICK

I, Susan McGeshick, affirm that I have personal knowledge of the matters set forth in this Affidavit and if I am called as a witness I will testify competently to these matters based on my personal knowledge:

1. I am currently the Treasurer of the Lac Vieux Desert Band of Lake Superior Chippewa Indians ("LVD"), a federally recognized Indian tribe. I was most recently re-elected to this position in November 2016.
2. My role as Treasurer of LVD is demanding and requires particularized attention to the needs of the LVD community. In order to best understand how to represent community and Tribal members, it is best for me to be physically present in the community, conversing with Tribal members in person and attending LVD Council meetings.
3. My position on LVD Council also requires me to attend meetings with local, state, and federal government bodies to represent my constituency on a host of government issues, including health care, law enforcement, environmental issues, education and childcare, land protection, economic development, cultural preservation, and housing. If I am unable to represent the LVD community at these, LVD's concerns will go unheard at key meetings on the provision of essential government services and during time-sensitive tribal consultations on upcoming policy and legislative changes that may have a substantial effect on LVD.

4. This lawsuit imposes a great burden on me and my community in the following ways:

- a. Spending time away from my community gravely affects my ability to represent Tribal members. As an elected official, it is my duty to my constituents to be present and available in my community as much as is possible as well as to represent my constituents at meetings and consultations with local, state, and federal government bodies; and
- b. Culturally, maximizing my time spent in my community and home is of utmost importance to me. The emotional burden of spending time away from my home and my culture compounds the other issues listed above.

5. I have already been required to devote in excess of 40 hours of my time to coordinate personnel, collect records and participate in discussions related to this lawsuit which has detracted from my duties as an Executive Officer of LVD.

6. I have never resided in Virginia.

7. I do not own property in Virginia.

8. I maintain no bank accounts in Virginia.

9. I do not have employees and offices in Virginia or engage in business in Virginia.

10. I have not personally met, contacted, spoken with, or had any interactions of any kind with any of the named Plaintiffs in the above captioned matter: Lula Williams, George Hengle, Gloria Turnage, Dowin Coffy, and Felix Gillison, Jr.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

By: Susan M. McGeshick

Susan McGeshick

GHWEGHZHIGOOKWAY MARTIN
NOTARY PUBLIC, STATE OF MI
COUNTY OF GOGEBIC
MY COMMISSION EXPIRES Jun 12, 2019
ACTING IN COUNTY OF

Sworn and subscribed before me James J. Martin, Notary Public,

On this 28th day of September, 2017, in the county of Gogebic.